



***National
Environmental
Achievement Track
Application Form***

Unilever Home & Personal Care USA

Name of facility

Unilever United States, Inc.

Name of parent company (if any)

1 John Street

Street address

Street address (continued)

Clinton, CT 06413

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Ed Pionke

Title Engineering Manager

Phone (860) 664-2550

Fax (860) 664-2905

E-mail ed.pionke@unilever.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Personal Care Products, including Pond's® Cold Cream, Vaseline® Petroleum Jelly, Creams/Lotions (Pond's®, Vaseline®, Suave®), Non-Aerosol Hairspray (Rave®, Finesse®, Salon Selectives®, Suave®), Plastic Bottles, Tubes, and Caps

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2844

NAICS
32562

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

CTD001186030

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

Air- CT GPLPE (synthetic minor)
Hazardous Waste- SQG Standards
Water- NPDES Direct Discharge,
NPDES Stormwater,
Pharmaceutical Effluent Limits (9/01)
Asbestos (abatement)
PCB (recordkeeping)
UST (inspection)
SPCC Plan
SARA 312
DOT Hazardous Materials shipping
OSHA Hazard Communication

7 Check the appropriate box in the right-hand column.

☒ I've listed the requirements above.

☐ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Charter StarTrack Member
ISO 14001, certified (7/99)

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Section C

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

Tell us about your past achievements and future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Emissions of VOCs	12.0	tons/yr	9.2	tons/yr
<p>i. How is the current level an improvement over the previous level?</p> <p>VOC Emissions have been reduced ~ 23%</p>				
<p>ii. How did you achieve this improvement?</p> <p>Formulation change reducing alcohol content in non-aerosol hairspray from 77% to 55% VOC</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Total Waster Use	Quantity 12,558,000	Units gal/yr	Quantity 11,258,000	Units gal/yr
<p>i. How is the current level an improvement over the previous level?</p> <p>Reduced annual water consumption ~1,300,000 gpy. Additional reductions realized in cooling tower energy consumption (decreased ~40%) and treatment chemical use.</p>				
<p>ii. How did you achieve this improvement?</p> <p>Eliminated once thru cooling on tube fillers and began using cooling towers.</p>				

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?	Water Usage and Discharge	
b. Is this aspect identified as significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	<input checked="" type="checkbox"/> Option A: Absolute value	37000 gpd (Quantity/Units)
	<input type="checkbox"/> Option B: In terms of units of production or output	(Quantity/Units)

- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value 3000 gpd
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output
- e. How will you achieve this improvement?
- Consolidation of miscellaneous plant non-contact cooling water flows and using it for cooling tower feed water. Using a recycle system to precoat WWTP vacuum filters rather than once through city water.

Second aspect you've selected

- a. What is the aspect?
- Emissions of VOCs
- b. Is this aspect identified as significant in your EMS?
- ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value 9.2 ton/yr
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value <4 tons/yr
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output
- e. How will you achieve this improvement?
- Install refrigeration unit to recover and return ethanol emissions to production process.

Third aspect you've selected

- | | | |
|---|---|-----------------------------|
| a. What is the aspect? | Total Solid Waste | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 100 tpy
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of units of production or output | (Quantity/Units) |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 90 tpy
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of units of production or output | (Quantity/Units) |
| e. How will you achieve this improvement? | Increase level of recycle, returning material to process. | |

Fourth aspect you've selected

- | | | |
|---|---|--|
| a. What is the aspect? | Packaging materials used in product | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 350 tons/yr
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of units of production or output | (Quantity/Units) |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 0 tons/yr |
| | <input type="checkbox"/> Option B:
In terms of units of production or output | (Quantity/Units)

(Quantity/Units) |

e. How will you achieve this improvement?

Eliminate outer carton on cold cream product.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

Section D

Tell us about your public outreach and reporting.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

The facility manager is advised of concerns from the community, and all responses are handled on a case-by-case basis. The engineering manager is consulted on environmental concerns.

2 How do you inform community members of important matters that affect them?

Facility management has close ties with the Clinton Chamber of Commerce and with the town 1st Selectman. Communication is initiated with these contacts; further communication, if necessary, is determined on a case-by-case basis.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www..unilever.com

☒ Newspaper

☐ Open Houses

☒ Other

Participation in Achievement Track will be publicized in the local paper, via internet and through "Power House" (internal company publication). The annual performance report will be made available upon direct request to the company and may be made available via the internet.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Clinton Chamber of Commerce	Ellen Cavanagh	(860) 669-3889
	1st Selectman of Clinton Town Government	James McMusker	(860) 669-9333
<i>State/Local Regulator</i>	State of CT Office of Gov. John G. Rowland	Sid Holbrook	(860) 524-7325
<i>Other community/local reference</i>	Connecticut State Senator (33rd District)	Eileen Daily	(860) 240-0443

Section E

Application and Participation Statement.

On behalf of Unilever HPC USA, Clinton CT
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Don Wilbur 9/26/00

Printed Name/Title Don Wilbur, Clinton Plant Manager

Facility Name Unilever Home & Personal Care USA, Clinton CT

Facility Street Address 1 John St,
Clinton CT 06413

Facility ID Numbers CTD001186030

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140